

Harris County  

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**HCPHES**  

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July 2, 2010

Mr. Stephen Tzhone, Remedial Project Manager  
United States Environmental Protection Agency (6SF-RA)  
1445 Ross Avenue  
Dallas, TX 75202

Subject: San Jacinto River Waste Pits Superfund Site – Comments on Draft Sampling and Analysis Plan Addendum – Chemical Fate and Transport Modeling Study

Dear Mr. Tzhone,

Harris County appreciates the opportunity to comment on the draft Sampling and Analysis Plan Addendum – Chemical Fate and Transport Modeling Study (Fate and Transport Study) for the San Jacinto River Waste Pits Superfund Site (SJRWPS) located in Harris County, Texas. Harris County's SJRWPS Technical Team includes members of Public Health and Environmental Services, Public Infrastructure Department and the County Attorney's Office. We are relying on the expertise of the EPA and natural resources trustees for review of this modeling study. Based on our experience we submit the following comments.

- Section 2.1, Page 3, Site History states at the end of the first paragraph: "For the purposes of the modeling study, the Study Area is defined as the San Jacinto River from Lake Houston to the Houston Ship Channel (Figure 1)." It is highly probable that transport of chemicals of potential concern (COPCs) from the Site are beyond the intersection with the Houston Ship Channel, thus the Study Area should be extended farther downstream to the entrance of the Houston Ship Channel into Galveston Bay. We understand that other sources of COPCs are likely and thus monitoring and design of the study should take this into consideration while accurately assessing the extent of COPCs fate and transport downstream.
- Section 2.1, Page 4, Site History makes reference in the final paragraph to "late successional stage estuarine riparian vegetation." During a Site visit, the Site seemed dominated by hackberry trees which are often considered pioneer or early successional stage trees in this portion of Texas. The basis for the characterization of the Site as having vegetation characteristic of a late successional stage should be validated to verify this description.
- Section 3.1, Page 9, Description of Modeling Framework. Will any of the system of models account for movement in the water column and sediments due to boat turbulence?

Thank you for the opportunity to review this Fate and Transport Study and provide comments. We look forward to contributing to the Superfund process through future document reviews. Should you have questions about these comments, please contact Steve Hupp, Administrator – Water and Solid Waste Programs at 713-439-6261 or by email at [shupp@hcphe.org](mailto:shupp@hcphe.org).

Sincerely,

A handwritten signature in blue ink, appearing to read 'H. Palacio', with a long horizontal flourish extending to the right.

Herminia Palacio, M.D., M.P.H.  
Executive Director

cc: Honorable Ed Emmett, Harris County Judge  
Commissioner Sylvia Garcia, Harris County Precinct Two  
Vince Ryan, Harris County Attorney  
John Blount, P.E., HCPID Architecture and Engineering Division